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February 24, 2000

BY HAND-DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket Number 990691-TP

Dear Ms. Bayo:

On behalf of ICG Telecom Group, I am enclosing a the original (for filing) and fifteen additional copies (for distribution) of the following:

- ▶ Motion for Additional Extension of Time to Prepare Conforming Agreement.

Please acknowledge receipt of the above on the extra copy for return to my office.

Thank you for your assistance.

Yours truly,



Joseph A. McGlothlin

AFA	_____
APP	_____
CAF	_____
CMU	<u>1</u> TAM/jk
CTR	_____ enc.
EAG	_____
LEG	<u>1</u>
MAS	<u>3</u> cc/enc.: Beth Keating
OPC	_____
PRR	<u>1</u>
SEC	<u>1</u>
VAW	_____
OTH	_____

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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RECORDS AND REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:	:	
	:	
Petition by ICG TELECOM GROUP, INC.	:	Docket No. 990691-TP
for Arbitration of an Interconnection	:	
Agreement with BELLSOUTH	:	Filed: February 24, 2000
TELECOMMUNICATIONS, INC. Pursuant to	:	
Section 252(b) of the Telecommunication	:	
Act of 1996	:	

**ICG TELECOM GROUP, INC.'S UNOPPOSED MOTION
FOR ADDITIONAL EXTENSION OF TIME
TO PREPARE CONFORMING AGREEMENT**

ICG Telecom Group, Inc. (ICG), through its undersigned counsel, moves for an extension of the time within which the parties are to submit an agreement conforming to Order No. PSC-00-0128-FOF-TP issued by the Commission on January 14, 2000, and in support states:

1. In the Final Order on Arbitration, Order No. PSC-00-0128-FOF-TP, the Commission memorialized its decision in the above arbitration docket and directed BellSouth Telecommunications, Inc. (BellSouth) and ICG to submit an agreement conforming to its decision within 30 days of the order.

2. On February 14, 2000, ICG filed a motion for an extension of ten days for the purpose of attempting to finalize the conforming agreement. BellSouth supported the request.

3. The parties have continued their efforts to develop a single document that is acceptable to both. However, outstanding issues remain, and with the time requirements associated with negotiation and internal review, the parties have been unable to complete the process within the ten-day extension. ICG requests the Commission to extend the deadline for an additional two weeks, or until March 9, 2000. At that time the parties will either submit a single document to which both

DOCUMENT NUMBER-DATE

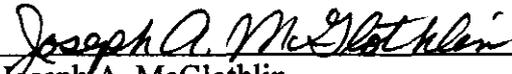
02541 FEB 24 8

FPSC-RECORDS/REPORTING

parties agree or, in the event it is necessary, submit the portion to which there is agreement and the language proposed by each with respect to any outstanding issues. Based on the efforts of both parties to date, ICG believes in good faith that the requested extension may serve to enable the parties to reach agreement or, at a minimum, to narrow the areas of disagreement.

4. ICG is authorized to represent that BellSouth Telecommunications, Inc. supports and joins in this request.

WHEREFORE, ICG requests an extension until March 9, 2000 for the purpose of submitting an agreement conforming to Order No. PSC-00-0128-FOF-TP.



Joseph A. McGlothlin

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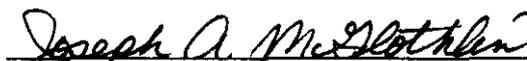
Attorneys for ICG Telecom Group, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy ICG Telecom Group, Inc.'s Motion for Additional Extension of Time to Prepare Conforming Agreement has been furnished by hand-delivery* and by United States mail this 24th day of February, 2000 to:

*Lee Fordham
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Gunter Building, Room 370
Tallahassee, FL 32399

*Nancy B. White
*Michael P. Goggin
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301



Joseph A. McGlothlin